

Texas Sunset Commission
P.O. Box 13066
Austin, TX 78711-3066

12/9/16

I am currently a 4th year student at the AOMA Graduate School of Integrative Medicine here in Austin. In fact I have only one week left of classes before graduating, and am currently a candidate in the doctoral program at AOMA as well. I would like to share my perspective as an acupuncture student and brand new licensee.

My background is in the financial and life insurance world, so when I originally looked at the prospect of Chinese medicine as a new career I dove into the industry outlook and ran many numbers prior to reaching a positive conclusion about its future potential. The history and knowledge base of this medicine is expansive and there are so many people who can benefit from the expertise of those fully trained and educated to practice acupuncture and Chinese medicine effectively. Once I became more deeply involved with the profession, however, I began to see cause for concern.

Education and Training Requirements

To understand some of my concerns one must first understand the level of training we acupuncture students undergo to become a Licensed Acupuncturist in Texas. The program at AOMA is a four year Masters level program and upon graduating I will have put in over 3000 hours, of which over 1000 are supervised hands on clinical training.

Before inserting a single acupuncture needle into an actual patient, I was required to take a Clean Needle Technique course, and pass both a written and practical exam in order to go into clinic. We study both Traditional Chinese Medicine and western medicine, and are expected to be able to identify potential red flags as well as any other medical practitioner. It is a rigorous course of academic and clinical study. Additionally, to become licensed, I have had to take and pass the full series of National Certification Commission of Acupuncture and Oriental Medicine board exams as well as a jurisprudence exam from the State of Texas. Additionally, I will now be required to take 17 hours of continuing education annually to maintain my license.

I have invested well over \$65,000 of my own money into this education and am adding to that figure now as I open a practice. The training required to develop the skills necessary to practice acupuncture safely and effectively and to meet the requirements of the State of Texas for licensure represents a significant investment of time and money.

Erosion of the Integrity of the Practice and Profession

One of the biggest concerns I have for my newly chosen profession is the erosion of the integrity of the license I have worked so hard to earn by other regulatory agencies allowing their licensees to practice with virtually no training, and no regulatory oversight.

For example, the Texas Board of Chiropractic Examiners requires chiropractors who choose to practice acupuncture to have a minimum of 100 hours of training (with no clinical component), yet the Chiropractic Board does not actually know which chiropractors practice acupuncture or with what level of training. And the Texas State Board of Physical Therapy Examiners allows its licensees to perform acupuncture under the guise of “dry needling” with *no* standards of training at all. These “dry needling” courses are typically a weekend. There is no Clean Needle Technique course. Nor is there any requirement of continuing education in acupuncture.

Given the standards of training a Licensed Acupuncturist is held to, it is inappropriate from a standpoint of public safety and also unfair from an economic standpoint for the state to require such a rigorous standard of training for one group of licensees while allowing licensees of another profession to practice acupuncture with little training or economic burden.

I liken this to me taking a weekend course in spinal manipulation and then representing myself as practicing chiropractic to an unsuspecting public. Were I to do this, I might well lose my license - and rightfully so. And yet, other professions do this very thing with acupuncture. The public has no way to know how little training the person putting needles in their body has, or that such vast disparities in training exist amongst different providers. Chiropractors not uncommonly identify themselves as “Certified” in acupuncture, and Physical Therapists simply represent their use of acupuncture needles as not being acupuncture. This is misleading and confusing, and also potentially dangerous for the public. And when results are poor or harm is caused it is also bad for the image of the Licensed Acupuncturist.

Insurance Reimbursement and Patient Access

Insurance reimbursement is another area of concern. With the opioid pandemic rising both in numbers and publicity, Licensed Acupuncturists are an obvious natural collaborator for pain clinics. Unfortunately, despite much research and many Cochrane reports, the majority of the medical community and the health insurance industry alike do not recognize the ability of acupuncture to ease both acute and chronic pain. And while great strides have been made in understanding the mechanisms of how acupuncture works, to be honest, my pain patients don’t care about the science behind acupuncture. All they care about is that they are no longer in severe pain.

Having done a rotation at the Austin Recovery Center in Buda (a substance abuse center), I can assure you that many people receive acupuncture because they have to find another way to manage their pain, not because they “believe” in it. The fact that most insurance barely acknowledges acupuncture as an alternative for the treatment of anything, much less pain is disappointing at best; it is downright criminal in my opinion. This limits access to acupuncture for a large percentage of the population who are unable to afford care out of pocket. And when it *is* reimbursed, it is at such a paltry rate that the paperwork is not worth the payout.

The Need for Greater Collaboration

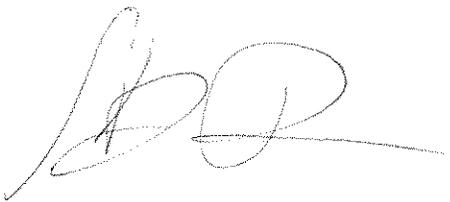
My last area of concern is the misunderstanding and lack of education about Chinese medicine and acupuncture, particularly in the medical community.

I am a member of the American Academy of Pain Management and when the opioid guidelines were passed down, the majority of the members panicked because they felt they had no options to ease patient's pain. The occasional comments from members on acupuncture were mostly focused on acupuncture as placebo. Once again, the patients I have treated with chronic pain DO NOT CARE *how* acupuncture works - just *that it works*. It is well known that the mechanism for many of the anti-psychotic pharmaceuticals is unknown and yet those medicines are prescribed freely. Acupuncture is a safe, effective, and cost-effective intervention. That there is room for more research should not be an impediment to greater access. I promise if a patient gets addicted to acupuncture, this is a good thing and won't cost millions of dollars and lives lost.

Why not more education and collaboration on acupuncture for pain and other conditions? We as a medical community can collaborate in ways not previously thought of and provide even better patient care. Some of these issues are prominent and weigh heavily day to day. A broader utilization of acupuncture would have a profound and immediate impact on the standard of care, particularly for pain patients.

Licensed Acupuncturists represent a highly educated and underutilized resource in Texas. We have very legitimate concerns about how inconsistencies of policy and regulation have impacted the integrity of our profession and license, the economic implications of this, and most importantly the implications for patient care and safety. Licensed Acupuncturists can and should play a greater role in the healthcare landscape of Texas. I look forward to being a part of this process in my professional life, and respectfully call on the Legislature to do its part to craft policies that positively address the concerns I have expressed here.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Stefanie Dwyer', written in a cursive style.

Stefanie Dwyer